



THE NAVAJO NATION

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Navajo Nation Environmental Protection Agency –Air Quality Control/Operating Permit Program

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Detailed Information

Permitting Authority: Navajo Nation Environmental Protection Agency

County: San Juan

State: New Mexico

AFS Plant ID: 35-045-NAV97

Facility: El Paso Natural Gas Company, LLC – White Rock Compressor Station

Document Type: STATEMENT OF BASIS

Part 71 Federal Operating Permit Statement of Basis

El Paso Natural Gas Company, LLC (EPNG)
White Rock Compressor Station
Permit No. NN OP 18-008

1. Facility Information

a. Permittee

El Paso Natural Gas Company (EPNG), LLC
2 North Nevada Avenue
Colorado Springs, Colorado 80903

b. Facility Location

NE ¼ of Section 15, Township 23-N, Range 14-W
22 miles East of Newcomb, New Mexico in San Juan County, NM

c. Contact Information

Facility Contact: Richard Duarte, Engineer – Air Compliance
Phone: (505) 831-7763

Responsible Official: Philip L. Baca, Division Director
Phone: (520) 663-4224

d. Description of Operations, Products:

The facility is a natural gas compressor station that performs gas inlet filtration and natural gas compression and transmission.

e. **Permitting and/or Construction History**

This plant was initially constructed in 1966 and originally consisted of one GE Frame 3 regenerative cycle turbine (A-01) for natural gas compression. On October 1, 1991, EPNG was issued permit PSD-NM-1000 by EPA Region VI for the modification of emission unit A-01 and the installation of one GE Frame 3 gas turbine (emission unit A-02) and two reciprocating combustion engines for auxiliary power generation (AUX A-01 and AUX A-02). On July 29, 2005, US EPA issued an addendum to PSD Permit NM 1000-B for the replacement of the existing emergency generator AUX A-01 with a smaller unit. In 2010, two Capstone C30 microturbines were installed at the facility (AUX A-03 and AUX A-04). The installation of these microturbines is considered to be an insignificant activity as the emissions are below the insignificant emission levels defined in 40 CFR 71.5(c)(11).

f. **Permitted Emission Units and Control Equipment**

Table 1 lists the permitted emission-generating units and activities at the facility.

Table 1. List of Emission Units

Unit ID	Unit Description	Maximum Capacity	Commenced Construction Date	Control Device
A-01	GE Frame 3 Gas Turbine	79.2 MMBtu/hr 10,040 hp	1966 and modified in 2001	N/A
A-02	GE Frame 3 Gas Turbine	93.9 MMBtu/hr 13,830 hp	1991	Dry Low NOx Combustion
AUX A-01	Natural gas-fired RICE*, for auxiliary power	2.6 MMBtu/hr 365 hp	2005	N/A
AUX A-02	Natural gas-fired RICE*, for auxiliary power	4.4 MMBtu/hr 400 hp	1991	N/A
AUX A-03 & AUX A-04	Two Capstone C30 microturbines	0.43 MMBtu/hr 40 hp each	2010	N/A

*RICE – Reciprocating Internal Combustion Engine

g. **Insignificant Emissions**

This facility also emits pollutants at insignificant levels, as described in 40 CFR § 71.5(c)(11)(ii), as follows:

- i. Fugitive VOC emissions from connections, flanges, open-ended lines, valves, and other components.

- ii. Emissions released during the use of the emergency shutdown system and pressure relief valves.
- iii. Emissions released during blowdown activities (during startup and shutdown).
- iv. Fire pump and air compressor engine emissions.
- v. Emissions released from any emission unit, operation, or activity that handles or stores a VOC or HAP organic liquid with a vapor pressure less than 1.5 psia.

h. Emissions Calculations

See Appendix A of this document for detailed emissions calculations.

i. Potential to Emit

Potential to emit (PTE) means the maximum capacity of any stationary source to emit any CAA-regulated air pollutant under the source's physical and operational design. See 40 C.F.R. § 52.21(b)(4). Any physical or operational limitation on the maximum capacity of EPNG White Rock to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of fuel combusted, stored, or processed, must be treated as part of its design if the limitation is enforceable by US EPA. PTE is meant to be a worst-case emissions calculation and is used in many cases, though not all, to determine the applicability of federal requirements. Actual emissions may be much lower than PTE. The potentials to emit are presented in Tables 2 and 3 below.

Table 2. Potential to Emit of Criteria Air Pollutants

Emission Unit	Regulated Air Pollutants in tons per year (tpy)					
	PM ₁₀	SO ₂	NO _x	VOC	CO	Total HAPs
A-01	2.29	1.18	177	0.73	32.1	0.34
A-02	2.71	1.40	66.4	0.86	46.8	0.40
AUX A-01	0.44	0.01	7.05	8.80	13.2	2.47
AUX A-02**	-	-	-	-	-	-
AUX A-03 & AUX A-04	0.03	0.02	0.16	0.06	0.43	0.00
Insignificant Emissions*	less than 5.00	-	-	less than 5.00	-	negligible
PTE of the Entire Source	10.5	2.60	251	15.5	92.5	3.21
Title V Major Source Thresholds	100	100	100	100	100	10 for a single HAP and 25 for total HAPs

*This is an estimate of emissions from blowdown activities and the fugitive VOC from equipment leaks

**Pursuant to PSD-NM-1000-B, unit AUX A-02 can only operate when unit AUX A-01 is not in operation. Since unit AUX A-01 has higher emission rates than unit AUX A-02, the total PTE for the entire source does not include the PTE for AUX A-02 (worst case scenario).

Table 3. Facility-Wide Greenhouse Gas Emissions Potential to Emit

Emission Unit	Greenhouse Gas Emissions (CO ₂ equivalent metric tons)
A-01	40,588
A-02	48,121
AUX A-01	1,332
AUX A-02	26
AUX A-03 & AUX A-04	444
Total	90,512

2. Tribe Information

a. General

The Navajo Nation has the largest land base of any tribe in the United States, covering 27,425 square miles in three states: Arizona, Utah, and New Mexico. The

Navajo Nation is currently home to more than 300,000 people. Industries on the reservation include oil and natural gas processing, coal mining, and tourism.

b. Local Air Quality and Attainment Status

All areas of the Navajo Nation are currently designated as attainment or unclassifiable for all pollutants for which a National Ambient Air Quality Standard (NAAQS) has been established.

3. Inapplicable Requirements

a. New Source Performance Standards (NSPS) for Stationary Combustion Turbines (40 CFR §§ 60.4300 – 60.4420; 40 CFR Part 60, Subpart KKKK)

On July 6, 2006, standards of performance for stationary combustion turbines (40 CFR §§ 60.4300-60.4420) were promulgated. This subpart applies to stationary combustion turbines that commence construction, modification, or reconstruction after February 18, 2005. This subpart does not apply to turbines A-01 and A-02 located at EPNG White Rock because they were both installed prior to February 18, 2005 and have not been modified or reconstructed.

In 2010, EPNG installed two natural gas microturbines (AUX A-03 and AUX A-04). Pursuant to 40 CFR § 60.4305(a), a stationary combustion turbine with a heat input at peak load equal to or greater than 10.7 gigajoules (10 MMBtu) per hour based on the higher heating value of the fuel, which commenced construction, modification, or reconstruction after February 18, 2005, is subject to this subpart. Since the heat input of each individual microturbine is 0.43 MMBtu/hr, the turbines AUX A-03 and AUX A-04 are not subject to the requirements of 40 CFR Part 60, Subpart KKKK.

b. NSPS for SO₂ Emissions from Onshore Natural Gas Processing for which Construction, Reconstruction, or Modification Commenced After January 20, 1984, and On or Before August 23, 2011(40 CFR §§ 60.640 – 60.648; 40 CFR Part 60, Subpart LLL)

These regulations apply to sweetening units and sulfur recovery units at onshore natural gas processing facilities. As defined in this subpart, sweetening units are process devices that separate hydrogen sulfide (H₂S) and carbon dioxide (CO₂) from a sour natural gas stream. Sulfur recovery units are defined as process devices that recover sulfur from the acid gas (consisting of H₂S and CO₂) removed from sour natural gas by a sweetening unit. There are no sweetening units or sulfur recovery units located at EPNG White Rock; therefore, this subpart does not apply.

c. NSPS for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants for which Construction, Reconstruction, or Modification Commenced

After January 20, 1984, and On or Before August 23, 2011 (40 CFR §§ 60.630 – 60.636; 40 CFR Part 60, Subpart KKK)

These regulations apply to compressors and other equipment at onshore natural gas processing facilities. As defined in this subpart, a natural gas processing plant is any processing site engaged in the extraction of natural gas liquids (NGLs) from field gas, fractionation of mixed NGLs to natural gas products, or both. NGLs are defined as the hydrocarbons, such as ethane, propane, butane, and pentane that are extracted from field gas. EPNG White Rock neither extracts natural gas liquids from field gas nor fractionates mixed NGLs to natural gas products and thus does not meet the definition of a natural gas processing plant under this subpart. Therefore, subpart KKK does not apply.

d. NSPS for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced after June 11, 1973, and Prior to May 19, 1978 (40 CFR §§ 60.110 - 60.113; 40 CFR Part 60, Subpart K)

These regulations apply to storage vessels for petroleum liquids with storage capacities greater than 40,000 gallons and do not apply to storage vessels for petroleum or condensate stored, processed, and/or treated at a drilling and production facility prior to custody transfer. There is no storage tank with a capacity greater than 40,000 gallons located on-site at EPNG White Rock; therefore, this subpart does not apply.

e. NSPS for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced after May 18, 1978, and Prior to July 23, 1984 (40 CFR §§ 60.110a - 60.115a; 40 CFR Part 60, Subpart Ka)

These regulations apply to storage vessels for petroleum liquids with storage capacities greater than 40,000 gallons and do not apply to petroleum storage vessels with capacities of less than 420,000 gallons used for petroleum or condensate stored, processed, or treated prior to custody transfer. There is no storage tank with a capacity greater than 40,000 gallons located on-site at EPNG White Rock; therefore, this subpart does not apply.

f. NSPS for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced after July 23, 1984 (40 CFR §§ 60.110b – 60.117b; 40 CFR Part 60, Subpart Kb)

These regulations apply to storage vessels with capacities greater than or equal to 75 cubic meters (471 bbl). There is no storage tank with a capacity greater than 75 cubic meters located on-site at EPNG White Rock; therefore, this subpart does not apply.

g. NSPS for Stationary Compression Ignition Internal Combustion Engines (40 CFR §§ 60.4200 – 60.4219; 40 CFR Part 60, Subpart IIII)

These regulations establish emission standards and compliance requirements to control emissions from compression ignition (CI) internal combustion engines (ICE) that commence construction, modification or reconstruction after July 11, 2005, where the CI ICE have been manufactured after specified dates. For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator. The emission unit AUX A-01 and AUX A-02 located at EPNG White Rock are natural gas-fired reciprocating internal combustion engines (RICE) that were constructed prior to July 11, 2005 and has not been modified or reconstructed after July 11, 2005; therefore, subpart IIII does not apply.

h. NSPS for Stationary Spark Ignition Internal Combustion Engines (40 CFR §§ 60.4230 – 60.4248; 40 CFR Part 60, Subpart JJJJ)

These regulations establish emission standards and compliance requirements to control emissions from spark ignition (SI) internal combustion engines (ICE) that commence construction, modification or reconstruction after June 12, 2006, where the SI ICE are manufactured on or after specified dates. For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator. AUX A-01 and AUX A-02 located at EPNG White Rock were constructed before June 12, 2006 and have not been modified or reconstructed after June 12, 2006; therefore, subpart JJJJ does not apply.

i. NSPS for Crude Oil and Natural Gas Production, Transmission and Distribution (40 CFR §§ 60.5360 – 60.5430; 40 CFR Part 60, Subpart OOOO)

These regulations establish emission standards and compliance schedules to control volatile organic compounds (VOC) and sulfur dioxide (SO₂) emissions from affected facilities that commence construction, modification or reconstruction after August 23, 2011. No equipment at the EPNG White Rock was constructed, modified or reconstructed after August 23, 2011; therefore, subpart OOOO does not apply.

j. NSPS for Crude Oil and Natural Gas Facilities (40 CFR §§ 60.5360a – 60.5499a; 40 CFR Part 60, Subpart OOOOa)

These regulations establish emission standards and compliance schedules for the control of the pollutant greenhouse gases (GHG) from affected facilities that commence construction, modification or reconstruction after September 18, 2015. No equipment at the EPNG White Rock was constructed, modified or reconstructed after September 18, 2015; therefore, subpart OOOOa does not apply.

k. National Emission Standards for Hazardous Air Pollutants (NESHAP) from Oil and Natural Gas Production Facilities (40 CFR §§ 63.760 – 63.779; 40 CFR Part 63, Subpart HH)

These regulations apply to affected units located at oil and natural gas production facilities that are major sources or area sources of hazardous air pollutants (HAPs), as defined in 40 CFR § 63.761, and that process, upgrade, or store hydrocarbon liquids prior to the point of custody transfer, or that process, upgrade, or store natural gas prior to the point at which natural gas enters the natural gas transmission and storage source category or is delivered to a final end user. Affected units for major sources are glycol dehydration units, storage vessels with the potential for flash emissions, groups of ancillary equipment (except compressors) located at natural gas processing plants that are intended to operate in volatile HAP service, and compressors located at natural gas processing plants that are intended to operate in volatile HAP service. Affected units for area sources consist of triethylene glycol (TEG) dehydration units. EPNG White Rock is not an oil or natural gas production facility; therefore, subpart HH does not apply.

l. NESHAP from Natural Gas Transmission and Storage Facilities (40 CFR §§ 63.1270 – 63.1289; 40 CFR Part 63, Subpart HHH)

These regulations apply to natural gas transmission and storage facilities that transport or store natural gas prior its entrance into a pipeline to a local distribution company or to a final end user and that are major sources of hazardous air pollutants (HAP), as defined in 40 CFR § 63.1271. The facilities covered by this source category include underground natural gas storage operations and natural gas compressor stations that receive natural gas via pipeline, from underground natural gas storage operations, or from natural gas processing plants. This subpart only applies to facilities that contain affected units, which consist of glycol dehydration units under 40 CFR § 63.1270(b). The EPNG White Rock compressor station does not have any glycol dehydration units and is an area source of HAPs. Therefore, subpart HHH does not apply.

m. NESHAP for Stationary Combustion Turbines (40 CFR §§ 63.6080 – 63.6175; 40 CFR Part 63, Subpart YYYY)

These regulations establish emission and operating limitations for hazardous air pollutant (HAP) emissions from existing, new, or reconstructed stationary combustion turbines located at major sources of HAP emissions as well as compliance requirements related to such limitations. A major source of HAP emissions is a source that emits or has the potential to emit 10 tpy of a single HAP or 25 tpy of a combination of HAPs. Under 40 CFR § 63.6090(b)(4), existing stationary combustion turbines that commenced construction or reconstruction on or before January 14, 2003 do not have to meet the requirements of this subpart. EPNG White Rock is an area source of HAP emissions and turbines A-01 and A-

02 at the facility were constructed before January 14, 2003. Therefore, the turbines A-01 and A-02 located at the facility are not subject to subpart YYYY.

The two microturbines AUX A-03 and AUX A-04 were constructed in 2010, which is after the applicability date of January 14, 2003. However, each individual microturbine has a power output of less than 1.0 megawatt (MW) and is located in an area source of HAP emissions and is exempt from the requirements of subpart YYYY pursuant to 40 CFR § 63.6090(b)(3).

n. Acid Rain Program (40 CFR Parts 72 – 78)

These regulations establish general provisions and operating permit program requirements for affected sources containing affected units. EPNG White Rock does not contain any affected units, as specified in 40 CFR § 72.6(a). Therefore, the emission units at EPNG White Rock are not subject to requirements of the Acid Rain Program.

o. Compliance Assurance Monitoring (CAM) Program (40 CFR Part 64)

These regulations apply to pollutant-specific emission units at major sources that are required to obtain 40 CFR part 70 or 71 permits where a unit is subject to an emission limitation or standard for the applicable regulated air pollutant, uses a control device to achieve compliance with such limitation or standard, and has potential pre-control device emissions of the applicable regulated air pollutant that equal or exceed the amount required for the source to be classified as a major source. No emission unit at EPNG White Rock uses an add-on control device as defined in 40 CFR § 64.1. Therefore, pursuant to 40 CFR § 64.2, the requirements of 40 CFR Part 64 are not applicable.

4. Applicable Requirements

The following requirements apply to the EPNG White Rock compressor station.

Table 4. Summary of Applicable Federal Requirements

Applicable Requirements	Emission Point/Unit
Federal Air Quality Requirement	A-01, A-02, AUX A-01, AUX A-02, AUX A-03, AUX A-04
PSD Permit PSD-NM-1000B	A-01, A-02, AUX A-01, AUX A-02
NSPS Subpart A (General Provisions)	A-01, A-02
NSPS Subpart GG (Gas Turbines)	A-01, A-02
NESHAP General Provisions (40 CFR Part 63, Subpart A)	AUX A-01, AUX A-02
NESHAP for RICE (40 CFR Part 63, Subpart ZZZZ)	AUX A-01, AUX A-02

Asbestos NESHAP (40 CFR 61, Subpart M)	Facility Wide
Protection of Stratospheric Ozone (40 CFR Part 82)	Facility Wide

a. Prevention of Significant Deterioration (PSD)

The EPNG White Rock compressor station is not one of the 28 source categories defined in 40 CFR § 52.21(b)(1)(i)(a) but has the potential to emit more than 250 tons per year of NO_x under 40 CFR § 52.21(b)(1)(i)(b). Therefore, this source is an existing major stationary source and is subject to PSD requirements for any major modification that will result in a significant emissions increase pursuant to 40 CFR 52.21(a)(2).

EPNG White Rock was constructed in 1966 and modified in 1991. The initial construction of this source in 1966 predated the PSD applicability date and was not subject to the PSD program. See 40 CFR 52.21(i)(1)(i). In 1991, El Paso Natural Gas installed one (1) GE Frame 3 gas turbine (unit A-02) and two (2) reciprocating combustion engines for auxiliary power (units AUX A-01 and AUX A-02). Unit A-01 was also modified to increase the maximum capacity. The modifications that occurred in 1991 were subject to Prevention of Significant Deterioration (PSD), and were permitted in PSD Permit NM-1000, issued by US EPA on October 1, 1991. This PSD permit included federally enforceable emission limitations for NO_x and CO.

On July 29, 2005, US EPA issued a minor modification to the original PSD permit (PSD Permit NM-1000-B), for the replacement of the existing 672 hp full time generator (unit AUX A-01) with a smaller unit.

On February 11, 2008, the permittee sent a letter to US EPA Region IX requesting an amendment to Permit no. PSD-NM-1000-B to incorporate changes to NSPS Subpart GG. Subpart GG was revised on July 8, 2004. The Permittee requested that the Permit PSD-NM-1000-B be revised to be consistent with the revisions to Subpart GG. The changes to Subpart GG included changes to sulfur and nitrogen monitoring requirements. 40 CFR 60.334(h)(3) was changed to allow the source to opt out of monitoring sulfur content, provided the permittee can demonstrate that their fuel meets the definition of natural gas in 40 CFR 60.331. The Permittee uses natural gas meeting the definition. El Paso Natural Gas can demonstrate compliance with the emission requirements of NSPS, Subpart GG without performing fuel sulfur monitoring. Therefore, the proposed amendment was to remove the existing monitoring requirements for sulfur content in Special Provision 12. US EPA amended Permit no. PSD-NM-1000-B.

On May 25, 2010, the permittee sent a letter to US EPA Region IX requesting several changes to Permit no. PSD-NM-1000-B, specifically requesting to revise the CO emission limits for the emergency backup engine, delete the quarterly NSPS reporting condition, and revise the performance the performance test frequency for the two gas turbines. US EPA issued an Administrative Amendment to Permit no.

PSD-NM-1000-B addressing these issues.

The following conditions are included from the PSD permit:

1. Pursuant to PSD-NM-1000-B, issued on October 1, 1991, as last amended October 10, 2010, the Permittee shall not exceed the emissions listed in the table below. The hourly NO_x and CO emission rates listed below are directly enforceable. Any proposed increase in emission rates may require an application for a modification of the facilities covered by permit no. PSD-NM-1000-B. [Permit PSD-NM-1000-B Special Provision VI.A]

Table 5. Emission Sources – Maximum Allowable Emission Rates

Emission Unit ID#	Unit Description	NO _x (Emission Rates)		CO (Emission Rates)	
		(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
A-01	One (1) natural gas-fired regenerative-cycle turbine	40.41	177	7.33	32.1
A-02	One (1) natural gas-fired regenerative-cycle turbine with dry low NO _x combustion	15.16	66.4	10.68	46.8
AUX A-01	One (1) natural gas-fired RICE, for auxiliary power generation	1.61	7.05	3.02	13.22
AUX A-02	One (1) natural gas-fired RICE, for auxiliary power generation	8	0.4	1.4	0.07

2. The emission concentration of nitrogen oxides (NO_x) in the stack gases from the gas turbine identified as emission point A-01 shall not exceed 166 parts per million by volume (ppmv). Measured stack concentrations shall be expressed on a dry basis at 15 percent oxygen. [Permit PSD-NM-1000-B Special Provision VI.C.a]
3. The emission concentration of carbon monoxide (CO) in the stack gases from the gas turbine identified as emission point A-01 shall not exceed 50 parts per million by volume (ppmv). Measured stack concentrations shall be expressed on a dry basis at 15 percent oxygen. [Permit PSD-NM-1000-B Special Provision VI.D.a]

4. The emission concentration of nitrogen oxides (NO_x) in the stack gases from the gas turbine identified as emission point A-02 shall not exceed 42 parts per million by volume (ppmv). Measured stack concentrations shall be expressed on a dry basis at 15 percent oxygen. [Permit PSD-NM-1000-B Special Provision VI.C.b]
5. The emission concentration of carbon monoxide (CO) in the stack gases from the gas turbine identified as emission point A-02 shall not exceed 61 parts per million by volume (ppmv). Measured stack concentrations shall be expressed on a dry basis at 15 percent oxygen. [Permit PSD-NM-1000-B Special Provision VI.D.b]
6. Emissions from the gas turbines shall not exceed 10 percent opacity, as determined by EPA Reference Method 9. [Permit PSD- NM-1000-B Special Provision VI.E]
7. Fuel fired at this facility is limited to pipeline quality sweet natural gas containing a maximum of 0.25 grains of hydrogen sulfide and 5.0 grains total sulfur per 100 dry standard cubic feet. Use of any other fuel will require a modification to this permit. [Permit PSD- NM-1000-B Special Provision VI.G]
8. Operation of the emergency generator, identified as emission point AUX A-02, shall be limited only to times when the full-time generator, identified as emission point AUX A-01, is not operational. [Permit PSD-NM-1000-B Special Provision VI.H]

b. New Source Performance Standard (NSPS) for Stationary Gas Turbines (40 CFR §§ 60.330-60.335; 40 CFR Part 60, Subpart GG):

These regulations apply to stationary gas turbines with a heat input at peak load equal to or greater than 10.7 gigajoules (10 million Btu) per hour, based on the lower heating value of the fuel fired that were constructed or modified after October 3, 1977. There are four natural gas-fired turbines, A-01, A-02, AUX-03, and AUX-04, at EPNG White Rock. The installation of AUX A-03 and AUX A-04 in 2010 did not trigger the requirements of this subpart because the heat input capacity of each individual turbine is 0.43 MMBtu/hr. Turbine A-01 was constructed before October 3, 1977. However, turbine A-01 was modified to increase the maximum capacity. The uprate in 1991 for turbine A-01 is considered a modification under 40 CFR 60 because it resulted in an increase in emissions of a regulated pollutant for which a standard existed. Turbine A-02 was constructed after the October 3, 1977 applicability date.

Therefore, both turbine A-01 and turbine A-02 are subject to the requirements of 40

CFR, Subpart GG and the general provisions of 40 CFR 60, Subpart A. However, pursuant to 40 CFR 60.332(l), both A-01 and A-02 are exempt from the NO_x limitations of this standard because both the units are classified as a regenerative cycle turbine and have a heat input less than 100 MMBtu per hour. A condition has been added to the permit to require the units A-01 and A-02 operate as regenerative cycle turbines at all times. Since A-01 and A-02 are not subject to the NO_x limitations of 60.332(a), there are no applicable continuous monitoring requirements for the NO_x emissions from turbines A-01 and A-02.

Turbines A-01 and A-02 are subject to the sulfur requirements in 40 CFR 60, Subpart GG. Pursuant to 40 CFR 60.333(b), the total sulfur contained in the fuel combusted shall not exceed 0.8 percent by weight (8,000 ppmw).

The permittee has elected not to monitor the total sulfur content of the natural gas combusted in turbines A-01 and A-02 by using natural gas which meets the definition in 40 CFR 60.331(u), pursuant to 40 CFR 60.334(h)(3). The permittee has provided an excerpt from its current tariff from the Federal Energy Regulatory Commission (FERC) demonstrating that the fuel delivered to this plant satisfied the "natural gas" definition in 40 CFR 60.331(u). No further compliance monitoring requirements under this NSPS are applicable to turbines A-01 or A-02. The permittee has performed a compliance stack test for turbines A-01 or A-02 in 2004.

c. NESHAP for Stationary Reciprocating Internal Combustion Engines (40 CFR §§ 63.6580 – 63.6675; 40 CFR Part 63, Subpart ZZZZ)

Subpart ZZZZ establishes national emission limitations and operating limitations for hazardous air pollutants emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions as well as compliance requirements related to these limitations. The EPNG White Rock compressor station is an area source of HAP emissions and consists of two 4-stroke rich burn auxiliary engines (AUX A-01 and AUX A-02) with less than 500 hp each. Pursuant to 40 CFR § 63.6603(a), AUX A-01 and AUX A-02 must meet the requirements of Table 2d:10.

d. Asbestos NESHAP (40 CFR Part 61, Subpart M)

EPNG is subject to the national emission standard for asbestos, 40 CFR Part 61, Subpart M, for all renovation and demolition projects, as specified in the permit document.

e. Protection of Stratospheric Ozone (40 CFR Part 82)

EPNG is subject to the requirements for protecting stratospheric ozone under 40 CFR Part 82. Applicable requirements are specified in the permit document.

Table 6. Incorporation of Applicable Requirements into the Part 71 Permit

Requirement	Condition/ Section	Condition in Part 71 Permit	Description/Notes
PSD permit PSD-NM-1000-B General Provisions	I.	II.A.10	Equivalency of Methods
	II.	II.A.11	Sampling Requirements
	III.	n/a	Appeal
	IV.	n/a	Construction Progress
	V.	II.A.17	Recordkeeping Requirements
PSD permit PSD-NM-1000-B Special Provisions	VI.A	II.A.1	Emission Sources - Maximum Allowable Emission Rates
	VI.B	II.A.8	Units A-01 and A-02 subject to NSPS
	VI.C.a	II.A.2	Limit of NO _x emission concentration for A-01
	VI.C.b	II.A.4	Limit of NO _x emission concentration for A-02
	VI.D.a	II.A.3	Limit of CO emission concentration for A-01
	VI.D.b	II.A.5	Limit of CO emission concentration for A-02
	VI.E	II.A.6	Opacity Requirements
	VI.F	II.A.12	Necessary parameters to comply with II.A.2, II.A.3, II.A.4, and II.A.5
	VI.G	II.A.7	Fuel SO ₂ Requirements
	VI.H	II.A.9	Operational Limit for AUX A-02
	II.VI.I.1	II.A.13.a	Performance test methods for NO _x , CO, and opacity
	II.VI.I.2	II.A.13.b	Initial compliance with SO ₂ limits
	II.VI.I.3	II.A.13.c	45 days notification
	II.VI.I.4	II.A.13.d	Contaminants to be tested
	II.VI.I.5	II.A.13.e	Sampling loads
	II.VI.I.6	II.A.13.f	Sampling frequency
	II.VI.I.7	II.A.13.g	Sampling report
	II.VI.J.1	II.A.14	Annual Stack Test Requirement
	II.VI.J.2	II.A.15	Continuous Compliance provisions
	II.VI.K	II.A.18	Recordkeeping Requirement
	II.VI.L	II.A.19	Reporting Requirement
NSPS - 40 CFR Part 60, Subpart A	60.1	n/a	Applicability (no requirements)
	60.2	n/a	Definitions (no requirements)

	60.3	n/a	Units and abbreviations (no requirements)
	60.4(a)	II.B.1	Submit reports to EPA Region IX and NNEPA
	60.4(b)	n/a	Submit reports to delegated agencies (Tribe is not the delegated authority for NSPS)
	60.5	n/a	Applicability determinations (places requirements on US EPA, not the facility)
	60.6	n/a	Review of plans (places requirements on US EPA, not the facility)
	60.7(a)	II.B.9	Notification of construction or reconstruction (one-time only)
	60.7(b)	II.B.2	Records of startup, shutdown, and malfunction
	60.7(c)	n/a	CEMS reporting
	60.7(d)	n/a	Report format for CEMS reporting
	60.7(e)	n/a	Reporting frequency (PSD permit requires semi-annual excess emissions reports)
	60.7(f)	II.A.17	Maintain monitoring records for 5 years (PSD permit requires 2 years)
	60.7(g)	n/a	Notification required by state/local agency (no such notification required)
	60.7(h)	n/a	Disclaimer that subpart may clarify or make inapplicable any general provisions
	60.8	n/a	Initial performance tests (one time only)
	60.9	II.B.3	Availability of information
	60.10	n/a	State authority (no requirements)
	60.11(a)	II.B.4	Compliance with non-opacity standards
	60.11(b)	n/a	Compliance with opacity standards (facility is not subject to opacity standard)
	60.11(c)	n/a	Times when opacity standards apply (facility is not subject to opacity standard)
	60.11(d)	II.B.5	Good practice to minimize emissions
	60.11(e)	n/a	Demonstrating compliance with opacity standards (facility is not subject to opacity standard)
	60.11(f)	n/a	Special provisions in subpart supersede general provisions (no requirements)
	60.11(g)	II.B.6	Credible evidence
	60.12	II.B.7	Circumvention
	60.13	n/a	CEMS requirements
	60.14	n/a	Modifications
	60.15	n/a	Reconstruction

	60.16	n/a	Priority list (no requirements)
	60.17	n/a	Incorporation of test methods by reference
	60.18	n/a	Requirements for flares (facility does not use flares to comply with NSPS)
	60.19	II.B.8	General notification and reporting
NSPS - 40 CFR Part 60, Subpart GG	60.330	n/a	Applicability (no requirements)
	60.331	II.C.3	NOx standard exemption during use of emergency fuel for A-02
	60.332	II.C.1	Standard for nitrogen oxides
	60.333	II.C.2	Standard for sulfur oxides (fuel sulfur standard)
	60.334(a)	n/a	Monitoring of water/steam, fuel for NOx control (the turbine does not use water injection to control NOx)
	60.334(b) & (c)	n/a	CEMS requirements
	60.334(d) through (g)	n/a	Monitoring of water/steam, fuel for NOx control for turbines constructed after July 8, 2004 (the turbine does not use water injection and was constructed in 2001)
	60.334(h)	II.C.4 II.C.5	Monitoring of fuel sulfur content not required if the fuel meets definition of natural gas in 40 CFR § 60.331(u)
	60.335	II.C.6 – II.C.8	Test methods and procedures
NESHAP - 40 CFR Part 63, Subpart A	63.1	n/a	Applicability (no requirements)
	63.2	n/a	Definitions (no requirements)
	63.3	n/a	Units and abbreviations (no requirements)
	63.4	II.D.1	Prohibited activities and circumvention
	63.5	II.D.2	Preconstruction notification
	63.6	n/a	Compliance with standards (no requirements)
	63.7	n/a	Performance testing (no requirements)
	63.8	II.D.3	Monitoring
	63.9	n/a	Notification
	63.10	II.D.4	Recordkeeping and reporting
	63.11-63.16	n/a	No requirements
	63.6580 through 63.6590 ZZZZ	n/a	Applicability (no requirements)
NESHAP - 40 CFR Part 63, Subpart ZZZZ	63.6595	II.E	Compliance date

	63.6600 through 63.6602	n/a	Emission limitations for stationary RICE located at major sources of HAP emissions (facility is an area source of HAP emissions)
	63.6603	II.E.1	Emission and operating limitations for existing stationary RICE located at an area source of HAP emissions (AUX A-01 and AUX A-02 are an auxiliary generators subjected to requirements of Table 2d.10 as stated in 40 CFR § 63.6603)
	63.6604	n/a	Diesel fuel requirements for CI RICE (Unit AUX A-01 and AUX A-02 are spark ignition RICES which uses natural gas as a fuel)
	63.6605	II.E.2	General compliance requirements
	63.6610 through 63.6620	n/a	Performance testing
	63.6625(e) (8) and (j)	II.E.3 - II.E.6	Maintenance and operation of auxiliary generators AUX A-01 and AUX A-02
	63.6630 through 63.6635	n/a	Initial compliance with emission and operating limitations and demonstration of continuous compliance (AUX A-01 and AUX A-02 are not subject to emission or operating limitations or demonstrations of continuous compliance)
	63.6640	II.E.7 - II.E.9	Demonstration of compliance & reporting
	63.6645	n/a	Notifications (facility is not required to submit notification required in this section)
	63.6650	II.E.10	Reports
	63.6655 and 63.6660	II.E.11 - II.E.13	Recordkeeping
	63.6665	n/a	General provisions
	63.6670	n/a	Implementation and enforcement
	63.6675	n/a	Definitions (no requirements)
Asbestos NESHAP - 40 CFR Part 61, Subpart M	61.140 through 61.157	III.E	Requirements for demolition and renovation at facilities containing asbestos
Stratospheric Ozone Protection – 40 CFR Part 82	82.1 through 82.306	III.D	Requirements for treatment of class I and class II substances

EPA promulgated a Federal Implementation Plan for preconstruction review of major sources in nonattainment areas and of minor sources and minor modifications at major sources in both attainment and nonattainment areas, which became effective on August 30, 2011. (See 76 FR 38748, July 1, 2011.) These regulations, codified in 40 CFR Parts 49 and 51, establish preconstruction review requirements for sources that will be incorporated in Part 71 federal operating permits. EPNG White Rock is not currently constructing new emission units or modifying existing emission units. In the future, if the facility constructs new emission units or modifies existing emission units, it may be required to obtain a permit from US EPA prior to construction.

5. Monitoring

The PSD Permit PSD-NM-1000 was first issued by US EPA for EPNG White Rock on October 1, 1991 and amended thrice on July 29, 2005, June 18, 2008 and October 25, 2010. The first Part 71 Operating Permit for the facility was issued by US EPA on December 26, 2000. NNEPA issued the Part 71 Operating Permit NN OP 05-008 for the facility on December 30, 2008. This permit is being renewed again in this action.

All conditions from previous approvals are being incorporated into this Part 71 Permit Renewal. One additional monitoring requirement, which comes from 40 CFR Part 63, Subpart ZZZZ, is being included in the Title V permit. The monitoring requirements in this permit are summarized below in Table 7.

Table 7. Monitoring in the Title V Permit

Requirement	Requirement Condition #	Monitoring in Part 71 Permit	Monitoring Condition #
NO _x , CO, and opacity Limits (A-01 and A-02)	II.A.2, II.A.3, II.A.4, II.A.5, & II.A.6	Stack testing annually	II.A.13 & II.A.14
Operating Hours Limit (AUX A-02)	II.A.9	Limit of Operating Hours	II.A.18
Fuel sulfur content limit	II.A.7	FERC tariff with maximum total fuel sulfur content of natural gas	II.C.5 & II.C.6

6. Endangered Species Act

Pursuant to Section 7 of the Endangered Species Act (ESA), 16 U.S.C. § 1536, and its implementing regulations at 50 CFR Part 402, US EPA is required to ensure that any action authorized, funded, or carried out by US EPA is not likely to jeopardize the continued existence of any federally listed endangered species or threatened species or result in the destruction or adverse modification of the designated critical habitat of any

such species. NNEPA is issuing this federal Part 71 permit pursuant to a delegation from US EPA. However, this permit does not authorize the construction of new emission units or emission increases from existing units, nor does it otherwise authorize any other physical modifications to the facility or its operations. Therefore, NNEPA and US EPA have concluded that the issuance of this permit will have no effect on listed species or their critical habitat.

7. Use of All Credible Evidence

Determinations of deviations from, continuous or intermittent compliance with, or violations of the permit are not limited to the testing or monitoring methods required by the underlying regulations or this permit. Other credible evidence (including any evidence admissible under the Federal Rules of Evidence) must be considered by EPNG White Rock, NNEPA and US EPA in such determinations.

8. NNEPA Authority

Authority to administer a Part 71 Permit Program was delegated to NNEPA by US EPA in part on October 13, 2004 and in whole on March 21, 2006. In delegating to NNEPA the authority to administer the Part 71 operating permit program, US EPA determined that NNEPA had adequate independent authority to administer the program, as required by 40 CFR § 71.10(a). Specifically, US EPA found NNEPA had adequate permit processing requirements and adequate permit enforcement-related investigatory authorities. Delegation Agreement between US EPA Region IX and NNEPA, §§ IV, V, VI.1, IX.2. Moreover, before waiving its collection of fees under 40 CFR § 71.9(c)(2)(ii), US EPA determined that NNEPA could collect sufficient revenue under its own authorities to fund a delegated Part 71 Program. Delegation Agreement at 1 and § II.2.

The Title V Permit therefore refers both to federal and to tribal provisions. When federal and tribal provisions are cited in parallel, the tribal provisions are identical to the federal provisions and compliance with the federal provision will constitute compliance with the tribal counterpart. Parallel tribal citations do not create any new requirements or impact the federal enforceability of the cited Part 71 requirements. All federal terms and conditions of the permit will be enforceable both by NNEPA and US EPA, as well as by citizens, under the federal Clean Air Act.

The provisions of Navajo law referenced in the permit will only be enforceable by NNEPA and will be enforced by NNEPA under the Navajo Nation Operating Permit Regulations and the Navajo Nation Air Pollution Prevention and Control Act, 4 N.N.C. §§ 1101-1162. Proposed Section IV.A (Fee Payment) refers only to the NNOPR as its source of authority because US EPA waived its collection of fees, as discussed above. This provision will be tribally enforceable only.

9. Public Participation

a. Public Notice

As described in 40 C.F.R. § 71.11(a)(5) and NNOPR § 403(A), all draft operating permits shall be publicly noticed and made available for public comment. The public notice requirements for permit actions and the public comment period are described in 40 C.F.R. § 71.11(d) and NNOPR § 403.

Public notice of this proposed permit action will be provided to EPNG, US EPA Region IX, and the affected state, local and tribal governments via a mailed copy of the notice. A copy of the notice will also be provided to all persons who submitted a written request to be included on the mailing list.

Public notice will be published in a daily or weekly newspaper of general circulation in the area affected by this source.

b. Response to Comments

NNEPA will respond to all significant comments received on the draft Part 71 permit.